

**UNITED STATES DISTRICT COURT**  
**MIDDLE DISTRICT OF TENNESSEE**

NIKKI BOLLINGER GRAE, Individually and	)	Civil Action No. 3:16-cv-02267
on Behalf of All Others Similarly Situated,	)	
	)	Honorable Aleta A. Trauger
Plaintiff,	)	
	)	Magistrate Judge Jeffrey S. Frensley
vs.	)	
	)	
CORRECTIONS CORPORATION OF	)	
AMERICA, et al.,	)	
	)	
Defendants.	)	
	)	
_____	)	

**DECLARATION OF MERYN C. N. GRANT IN SUPPORT OF DEFENDANTS' REPLY**  
**MEMORANDUM OF LAW IN FURTHER SUPPORT OF THEIR**  
**MOTION FOR SUMMARY JUDGMENT**

I, Meryn C. N. Grant, declare as follows:

1. I am over 18 years of age and am competent to testify as to the matters stated in this Declaration. I am an associate with Latham & Watkins LLP, one of the law firms representing Defendants CoreCivic, Inc. (“CoreCivic”), Damon T. Hininger, David M. Garfinkle, Todd J. Mullenger, and Harley G. Lappin (collectively, “Defendants”).

2. Attached hereto as **Exhibit 161** is a true and accurate copy of the Thomas Reuters StreetEvents’s “CXW – Corrections Corp of America at REITWeek: NAREIT’s Investor Forum” Edited Transcript, dated June 8, 2016.

3. Attached hereto as **Exhibit 162** is a true and accurate copy of an article entitled “Can prisons be run cheaper?,” by Rebecca Boone, dated March 5, 2012, produced by Defendants’ expert Justin Marlowe in discovery, Bates-numbered MARLOWE\_0006997-98.

4. Attached hereto as **Exhibit 163** is a true and accurate copy of the September 1, 2020 errata to the transcript of the deposition of Harley G. Lappin, taken July 28, 2020.

5. Attached hereto as **Exhibit 164** is a true and accurate copy of excerpts from the transcript of the deposition of Jeb Beasley, taken March 10, 2020.

6. Attached hereto as **Exhibit 165** is a true and accurate copy of excerpts from CoreCivic’s Quarterly Report on Form 10-Q, filed with the Securities and Exchange Commission on November 5, 2020.

7. Attached hereto as **Exhibit 166** is a true and accurate copy of excerpts from the transcript of the deposition of William Dalius, taken February 26, 2020.

Pursuant to 28 U.S.C. § 1746, I declare, under penalty of perjury, that the foregoing is true and correct to the best of my knowledge.

Executed on February 19, 2021 in Los Angeles, California.

/s/ Meryn C. N. Grant  
Meryn C. N. Grant

## **CERTIFICATE OF SERVICE**

I hereby certify that service of the foregoing document was made upon the following Filing Users through the Electronic Filing System:

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this 19th day of February, 2021.

/s/ Meryn C. N. Grant  
Meryn C. N. Grant